## **Remarks**

Reconsideration of the above-identified application is respectfully requested. Prior to the entry of this Response, claims 1-22 were pending in this application. Upon entry of this Response, claims 1, 4-6 and 9-22 will be pending.

In the Office Action mailed December 2, 2004, the Examiner objected to the drawings. In response, the Applicants have revised Figures 1 and 2 as suggested by the Examiner. Reconsideration of the objection to the drawings is therefore respectfully requested.

In the December 2, 2004 Office Action, the Examiner also objected to claims 1-10 based on various informalities. The Applicants respectfully traverse that objection, as the invention as recited in claims 1-10 is taught in the Specification. In that regard, the terms objected to by the Examiner are discussed, for example, on page 13, lines 7-17, of the Specification. Reconsideration of the Examiner's objection to claims 1-10 is therefore respectfully requested.

In that same Office Action, the Examiner also rejected claims 1-22 under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,379,391 ("the '391 patent"). The Applicants respectfully traverse that rejection for the reasons set forth in detail below.

**Amendments to the Drawings:** 

The two attached sheets of drawings includes changes to Figures 1 and 2. These

sheets, which includes Figures 1 and 2, replaces the original sheets including Figures 1 and

2. The only change to Figures 1 and 2 is the addition of the legend "Prior Art," as suggested

by the Examiner.

Attachment:

Two Replacement Sheets

-7-

S/N: 10/023,321

Response to Office Action of December 2, 2004

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Rejection of Claims 1-22 Under 35 U.S.C. §102(b)

As noted above, in the December 2, 2004 Office Action, the Examiner rejected

claims 1-22 under §102(b) as anticipated by the '391 patent. The Applicants believe, however,

that the claimed invention is not anticipated by that reference.

In that regard, the hash table and collision list of the '391 patent are not the

same as the virtual address table and location identifier table of the Applicants' claimed

invention. For example, with the hash collision mechanism of the '391 patent, when a write

operation occurs to a data record, the appropriate element in the collision list must be located

and removed from the list, and all other members must be re-linked. In contrast, using the

virtual address and location identifier tables of the Applicants' claimed invention, the data

entry record for the cache location can be changed without affecting the other data records.

In such a fashion, the Applicants' claimed invention is faster and more efficient, particularly

where a larger number of write operations are required.

Thus, the '391 patent fails to anticipate the Applicants' claimed invention as

recited in independent claims 1, 6, 11 and 17. Reconsideration of the Examiner's rejection of

those claims under §102(b) is therefore respectfully requested.

Claims 4, 5, 9, 10, 12-16 and 18-22 depend either directly or indirectly from

independent claims 1, 6, 11 or 17, respectively, and include all the limitations thereof. As a

result, and in light of the foregoing remarks concerning claims 1, 6, 11 and 17, the Applicants

believe that claims 4, 5, 9, 10, 12-16 and 18-22 likewise overcome the Examiner's rejection

thereof under §102(b), and reconsideration of that rejection is also respectfully requested.

-9-

Atty Dkt No. STK 01053 PUS (2001-053-ICE)

S/N: 10/023,321

Response to Office Action of December 2, 2004

**Conclusion** 

For at least the foregoing reasons, the Applicants believe that claims 1, 4-6 and

9-22 meet both the formal and substantive requirements for patentability, and that the

application is in condition for allowance. Accordingly, such action by the Examiner is

respectfully requested.

If a telephone conference would expedite allowance or resolve any additional

questions, such a call is invited at the Examiner's convenience.

Respectfully submitted,

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Date: <u>February 23, 2004</u>

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